

**UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Counsel to Laura Cantor Inc.

In re:

LAURA CANTOR INC.,

Debtor.

Chapter: 11 (Sub V)

Case No.: 22-10406

Judge: Vincent F. Papalia

Recommended Local Form:

☐ Followed

☒ Modified

APPLICATION FOR RETENTION OF PROFESSIONAL

1. The applicant, Laura Cantor Inc. (the “Debtor”), is the:

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13

☒ Debtor: ☐ Chap. 7 ☒ Chap. 11 ☐ Chap. 13

2. The applicant seeks to retain the following professional, RK Consultants, LLC,

f/k/a Ryniker Consultants, LLC (“RK”) to serve as:

☐ Attorney for: ☐ Trustee ☒ Debtor-in-Possession

☐ Official Committee of _____

☐ Accountant for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of _____

☒ Other Professional:

☐ Realtor ☐ Appraiser ☐ Special Counsel

☐ Auctioneer ☒ Other (specify): Financial Advisors

3. The employment of the professional is necessary because:

The Debtor seeks to employ RK as its financial advisor to assist it in carrying out its duties under this title and administering this chapter 11 case, effective as of the February 1 2022, and pursuant to the terms of an engagement agreement between RK and the Debtor dated January 14, 2022.

4. The professional has been selected because:

Due to the fact that the Debtor's books and records were and are continually being held by CBA Group USA, Inc. the Debtor's pre-petition bookkeeper, and as a result, the books and records needed to be recreated and reconstructed in most instances, as well as, the need for financial advisors who are experienced subchapter V of the Bankruptcy Code, the Debtor has determined that the services of experienced financial advisors, such as RK, will substantially enhance the Debtor's efforts to file a confirmable plan of reorganization. RK is well qualified to act on the Debtor's behalf given its extensive knowledge and expertise in matters of this type. RK's professionals have considerable expertise in the fields of bankruptcy, insolvency, reorganizations, liquidations, business valuations, and corporate reorganizations, among other practice areas. RK's professionals involved with the Debtor's engagement are familiar with the Debtor's business, financial affairs, and capital structure. Since its initial retention by the Debtor, RK has worked closely with the Debtor's management and other professionals to understand the Debtor's business and coordinate the necessary professional services and other vital aspects of preparing for the Chapter 11 Case. Accordingly, the Debtor believes that RK has developed significant relevant experience regarding the Debtor.

5. The professional services to be rendered are as follows:

- (a) Work collaboratively with the Debtor's Board of Directors, legal counsel and other professionals and employees of the Company;
- (b) Assist the Debtor in cash management and cash flow forecasting processes, including the monitoring of actual cash flow versus projections (if needed);
- (c) Assist the Debtor in connection with Debtor's preparation of various financial reports, including the Schedules and Statement of Financial Affairs, which may be required by the Court;
- (d) Assist the Debtor in connection with the formulation, negotiation and promulgation of a Chapter 11 plan; and
- (e) Provide advice and recommendations with respect to other related matters as the Debtor or its professionals may request from time to time, as agreed to by RK.

6. The proposed arrangement for compensation is as follows:

Subject to Court approval in accordance with Section 330 of the Bankruptcy Code, RK and the Debtor agreed to compensation will be payable to RK at its normal and customary rates which range between \$100 to \$400 per hour, plus reimbursement of actual, necessary expenses and other charges incurred upon application therefor.

In the ninety (90) days prior to the Petition Date, RK was paid a retainer from the Debtor in the amount of \$10,000.00. As of the filing of the Petition, the retainer balance is \$6,400.

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows: See Certification of Professional filed contemporaneously herewith.

8. To the best of the applicant's knowledge, the professional:

- does not hold an adverse interest to the estate.
- does not represent an adverse interest to the estate.
- is a disinterested person under 11 U.S.C. § 101(14).

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

WHEREFORE, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, as of January 18, 2022, with compensation to be paid as an administrative expense, in such amounts as the Court may hereafter determine and allow.

Date: March 3, 2021

LAURA CANTOR INC.



Laura Cantor, President